

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

NOORANI TRADING INC., )  
                            )  
                            )  
Plaintiff,               )  
                            ) CIVIL ACTION NO.  
vs.                        )  
                            ) 1:17-cv-1344-LLM  
AMIT F. BIJANI, et al, )  
                            )  
                            )  
Defendants.             )

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**CONSENT MOTION TO AMEND VERIFIED COMPLAINT TO DROP  
WITHOUT PREJUDICE DEFENDANTS FIROZ BIJANI AND DANNY  
BIJANI AND TO RENAME DEFENDANT AMIT F. BIJANI AND  
SUPPORTING MEMORANDUM**

Pursuant to Fed. R. Civ. P. 21, Plaintiff Noorani Trading Inc. (“Noorani” or “Plaintiff”), with the consent of Defendants, moves the Court to (i) drop Defendant Firoz Bijani who is deceased and, on information and belief, died before the events leading to this action took place, (ii) drop Defendant Danny Bijani who is not a natural person, and (iii) rename Defendant Amit F. Bijani as “Amit F. Bijani a/k/a Danny Bijani” because Amit Bijani uses and is recognized by that assumed name.

In support of its Motion, Plaintiff shows that granting the same will assist in securing the just, speedy, and inexpensive determination of this action. Based on

all of the forgoing, Plaintiff's Motion should be granted, and Plaintiff submits contemporaneously herewith a Proposed Order granting the same.

Respectfully submitted, this 12<sup>th</sup> day of July, 2017.

/s/ J. Rodgers Lunsford III

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/s/ David M. Lilienfeld

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Attorneys for Defendants

**CERTIFICATE OF SERVICE**

I, J. Rodgers Lunsford III, hereby certify that the CONSENT MOTION TO AMEND VERIFIED COMPLAINT TO DROP WITHOUT PREJUDICE DEFENDANTS FIROZ BIJANI AND DANNY BIJANI AND TO RENAME DEFENDANT AMIT F. BIJANI AND SUPPORTING MEMORANDUM was served electronically upon the following counsel of record for Defendants:

David M. Lilenfeld  
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This 12<sup>th</sup> day of July, 2017.

/s/ J. Rodgers Lunsford III

J. Rodgers Lunsford III